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*Pennsylvania
New Jersey
Delaware
Maryland
Washington, DC
Florida*

February 26, 1999

Peterson/Puritan
119
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VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency
David J. Newton, RPM
NH and RI Superfund Section
Office of Site Remediation and Restoration
1 Congress Street, Suite 1100 (Mail Code - HBO)
Boston, MA 02114-2023

Re: Request for Information - Peterson/Puritan, Inc. Site
Operable Unit 2

Dear Mr. Newton:

I am writing to you in my capacity as legal counsel for General Cable Industries, Inc. ("GCI") in response to the U.S. Environmental Protection Agency's ("EPA") January 11, 1999 Request for Information regarding the above-referenced site (the "Site"). As you may know, GCI was granted an extension until March 1, 1999 to submit its response.

EPA's information request letter was addressed to General Cable Corporation regarding Carol Cable Company facilities located in the vicinity of the Site. In or about 1992, Carol Cable Company was merged into GCI, which is a wholly-owned subsidiary of General Cable Corporation. General Cable Corporation is a publicly traded company listed on the New York Stock Exchange. Immediately prior to that merger, the stock of Carol Cable Company was owned by The Penn Central Corporation.

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GCI has identified the following eight (8), Carol Cable Company manufacturing facilities has being or having been located within a 60 mile radius of the Site:

1. Lincoln, RI
1 Carol Drive
Lincoln, RI 02865
2. Pawtucket, RI
249 Roosevelt Avenue
Pawtucket, RI 02682
3. Warren, RI
426 Metacom Avenue
Warren, RI
4. Woonsocket, RI
150 Hamlet Avenue
Woonsocket, RI 02895
5. Central Falls, RI
1152 High Street
Central Falls, RI 02863
6. Taunton, MA
37 Cushman Street
Taunton, MA 02780
7. New Bedford, MA
11 Cove Street
New Bedford, MA 02744
8. Worcester, MA
50 Gardener Street
Worcester, MA 01610

Of these 8 facilities, only the Lincoln, RI and Taunton, MA facilities remain in operation.

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An extensive search for documents which would indicate that wastes from these facilities were transported to or disposed of at the Site was conducted for each of the above-listed facilities. This search included a review of approximately 70 warehoused storage boxes containing environmental records, corporate ledgers and accounting records and contracts from the closed Carol Cable Company facilities identified above. No records were located indicating removal of waste to the Site.

In addition to this record search, current GCI personnel who work or had worked at these facilities were interviewed. None had any knowledge of use of the Site for waste disposal.

Given the 32 year period being investigated by EPA (1954-1986), it is likely that at least some facility records were discarded pursuant to company record retention policies. GCI's current record retention policy is, however, to retain hazardous waste manifests permanently. The fact that no such manifests were found indicates that hazardous wastes were not disposed of at the Sites by the facilities.

The following persons assisted in the search for information responsive to EPA's January 11, 1999 request:

1. Kevin Mello - Plant Engineer,
Lincoln, RI facility
2. Harry Ryan - Plant Manager,
Taunton, MA facility
3. Katherine S. Rademacher - Paralegal,
General Cable Corporation
4. Kenneth N. Klass - Counsel
Blank Rome Comisky & McCauley

I was advised by Michelle Cutler-Jones, Esq. during a telephone conversation we had the week of February 4, 1998, that GCI need not respond to the remainder of EPA's information request if our information search revealed no waste transport to or disposal at the Site. As GCI has found no such information, it has not, consistent with Ms. Cutler-Jones' advice, gathered this other information.

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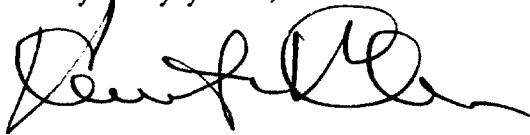
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As noted above, The Penn Central Corporation was a previous owner of the stock of Carol Cable Company. It is our understanding that American Premier Underwriters, Inc. ("APU") is the successor to The Penn Central Corporation. GCI does not know whether APU has information about any use of the Site by the above-listed Carol Cable Company facilities. APU may, however, be contacted at the following address:

American Premier Underwriters, Inc.
One East Fourth Street
Cincinnati, OH 45202
Attn: Ms. Lori J. Lackner, Environmental Manager

Please direct any future correspondence and communications regarding the Site to me at the above address and telephone number.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kenneth N. Klass', with a stylized, cursive script.

KENNETH N. KLASS

K:\KLASS\G-CABLE\MILLS-EPA.LTR

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Kenneth N. Klacsek
BLANK ROMÉ COMISKY & MCCAULEY L
Counselors at Law
One Logan Square
Philadelphia, Pennsylvania 19103-6998

the right of the return address

CERTIFIED

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MAIL

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